Case 1-16-43485-nhl Doc 111 Filed 12/20/18 Entered 12/20/18 18:17:32



December 20, 2018

By ECF

The Honorable Nancy Hershey Lord United States Bankruptcy Judge, Eastern District of New York Conrad B. Duberstein Courthouse 271-C Cadman Plaza East – Suite 1595 Brooklyn, New York 11201

Re: <u>In re Zenith Management 1, LLC: Case No. 1-16-43485-NHL</u>

Dear Judge Lord:

Our law firm represents Karla Vera, Judgment Creditor in the above-referenced case. We appeared this afternoon before Your Honor on an Order to Show Cause seeking to hold the purchaser of one of the debtor's properties in contempt for violating a Court Order by having paid real estate transfer taxes with sale proceeds instead of in addition to sales proceeds. Our motion was unopposed and neither the purchaser nor his real estate counsel appeared in court today. Your Honor asked that we supplement our motion papers with a copy of a signed "Terms and Conditions" document and adjourned the motion accordingly to January 24, 2019.

Attached is a copy of the document Your Honor requested, signed by the purchaser acknowledging the terms and conditions of sale, specifically the requirement that he pay real estate transfer taxes (paragraph I). This mirrors the language contained in paragraph M of Your Honor's Order dated June 25, 2018 (document #84 on the Court docket).

Since the motion was unopposed and we have been able to provide the requested document just several hours after the hearing, we most respectfully ask if Your Honor would grant the relief sought in our motion without the need for further service of papers or a further appearance on January 24, 2019. A proposed Order is attached to the original motion papers.

Thank you very much for your time and consideration.

Respectfully submitted,

Steven G. Yudin, Esq.

Bernard D'Orazio & Associates, P.C.